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PACIFIC GAS & ELECTRIC COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

)	Case No. CV 10-5288 SBA
PACIFIC GAS & ELECTRIC COMPANY,)	
)	
Plaintiff and Counterdefendant,)	STIPULATION AND [PROPOSED]
)	ORDER EXTENDING TIME TO FILE
v.)	ATTORNEYS' FEES MOTION
)	
)	Civil Local Rule 6-2
SEIU LOCAL 24/7,)	
)	
)	Courtroom 1, 4th Floor
Defendant and Counterclaimant.)	Judge: Hon. Sandra B. Armstrong
)	

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME
TO FILE ATTORNEYS' FEES MOTION**

Whereas, this Court entered judgment for Defendant and Counterclaimant SEIU 24/7 ("the Union") on January 30, 2012;

Whereas, the Union intends to seek attorneys' fees and costs;

Whereas, pursuant to Federal Rule Civil Procedure 54(d)(2)(B) and Civil Local Rule 54-5(a), any such motion for attorneys' fees must be filed within two weeks of the date of judgment, that is, by February 13, 2012;

Whereas, Civil Local Rule 54-5(a) requires counsel for both sides to meet and confer for the purpose of resolving all disputed issues relating to attorneys' fees before bringing such a motion;

Whereas, lead counsel for the Union has a trial starting February 13, 2012 and a reply brief in a major appellate case due on February 16, 2012, and is therefore unable to file the motion within the two weeks allowed by the Rules;

Whereas, Plaintiff and Counter defendant PG&E has agreed to extend the Union's time to file its motion for attorneys' fees, providing that PG&E receives a corresponding time in which to oppose the Union's motion; and

Whereas, the commentary to Civil Local Rule 54-5 acknowledges the "short time period" allotted under the Rule and contemplates that extensions will be sought and granted.

It is therefore stipulated to by and between the parties, and requested that the Court so order:

1) That the Union shall have a two week extension of time, to and including February 27, 2012, in which to file a Motion for Attorneys' Fees;

2) That PG&E shall have a two week extension of time, to and including March 26, 2012, in which to oppose the Union's Motion for Attorneys' Fees;

3) That the Union shall have until April 19, 2012, to file a Reply Brief in support of its Motion for Attorneys' Fees;

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1 Dated: February 8, 2012.

2 JEFFREY B. DEMAINE
3 EVE H. CERVANTEZ
4 Altshuler Berzon LLP

5 By: /s/ Eve H. Cervantez
6 Eve H. Cervantez

7 Attorneys for Defendant and Counterclaimant
8 SEIU Local 24/7

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13 By: /s/ Joshua D. Kienitz
14 Joshua D. Kienitz


15 Attorneys for Plaintiff and Counterdefendant
16 PACIFIC GAS & ELECTRIC COMPANY

17 **[PROPOSED] ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 The motion for attorneys' fees is REFERRED to the Chief Magistrate Judge or her designee
20 for preparation of a report and recommendation.

21 Dated: 2-10-12_____

22 By: 
23 The Honorable Sandra B. Armstrong
24 United States District Court Judge
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